

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

**TONYA HOWARD and EBONY
JOHNSON, Each Individually and on
Behalf of All Others Similarly Situated**

PLAINTIFFS

vs.

No. 1:22-cv-2817-MSS

**TATE LEGACY INCORPORATED
and DARLENE TATE**

DEFENDANTS

JOINT STATUS REPORT

Plaintiffs Tonya Howard and Ebony Johnson (“Plaintiffs”), and Defendants Tate Legacy Incorporated and Darlene Tate, (“Defendants”), by and through their undersigned counsel, submit the following Joint Status Report:

1. Pursuant to the Minute Order on May 4, 2023 (ECF No. 31), the Parties are filing a joint status report.
2. On May 4, 2023, the Parties filed a Joint Motion for Referral to Magistrate for Settlement Conference (ECF No. 29), which this Court granted. See ECF Nos. 31, 32, & 34.
3. The Court referred the Parties to Magistrate Judge Jantz for the purpose of participating in a settlement conference. ECF No. 32.
4. Magistrate Judge Jantz held a hearing with the Parties on May 11, 2023, and ordered that Plaintiffs should make a settlement demand by June 2, 2023, and Defendants should make a counteroffer by June 23, 2023. ECF No. 35. Magistrate Judge Jantz has scheduled another hearing with the Parties for July 7, 2023, in which the Parties

will provide a report on the status of settlement discussions and will also provide everyone's availability for a settlement conference date to be set. *Id.*

5. Pursuant to the May 11, 2023, Order (ECF No. 35), Plaintiffs have made a settlement demand to Defendants, and Defendants are currently preparing a response and counteroffer. The Parties intend to make as much progress in settlement negotiations as possible prior to the next scheduled hearing with Magistrate Judge Jantz on July 7, 2023.

6. The Parties would propose that discovery close 60 days after the Parties have participated in the magistrate judge settlement conference. To be as cost-effective as possible, the Parties are currently focusing their efforts and resources on trying to resolve this case. If the Parties are unable to resolve this case amongst themselves by July 7, 2023, then Magistrate Judge Jantz will likely set a date for the magistrate judge settlement conference at the July 7, 2023 hearing.

Respectfully submitted,

**TONYA HOWARD and EBONY
JOHNSON, Each Individually
and on Behalf of All Others
Similarly Situated, PLAINTIFFS**

SANFORD LAW FIRM
Kirkpatrick Plaza
10800 Financial Centre Pkwy, Suite 510
Little Rock, Arkansas 72211
Telephone: (800) 615-4946
Facsimile: (888) 787-2040

/s/ Colby Qualls
Colby Qualls
Ark. Bar No. 2019246
colby@sanfordlawfirm.com

/s/ Josh Sanford

Josh Sanford

Ark. Bar No. 2001037

josh@sanfordlawfirm.com

and **TATE LEGACY INCORPORATED
and DARLENE TATE**

SMITH ATTORNEYS GROUP AT
LAW P.C.

47 W. Polk Street, Suite 545

Chicago, Illinois 60605

Telephone: (708) 433-9138

/s/ Te D. Smith

Te D. Smith

NJ Bar No. 229812017

tsmith@saglawpc.com